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EXHIBITS: One

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

Civil Action  
No. 04 CV 10746 JLT

IVAN SANTIAGO,  
Plaintiff,

v.

WILLIAM J. FEENEY,  
MARCUS EDDINGS, and  
the CITY OF BOSTON,  
Defendants.

DEPOSITION of IVAN SANTIAGO, a  
witness called on behalf of the Defendants,  
pursuant to the applicable provisions of the  
Federal Rules of Civil Procedure, before  
Myriam A. Maracas, Registered Professional  
Reporter and Notary Public in and for the  
Commonwealth of Massachusetts, at the  
City of Boston Law Department, City Hall,  
Boston, Massachusetts, on Tuesday, January  
18, 2005, commencing at 1:20 p.m.

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## APPEARANCES:

## HRONES AND GARRITY

(by Stephen Hrones, Esq.)  
Lewis Wharf, Bay 232, Boston, MA  
02110-3927, for the Plaintiff.

## CITY OF BOSTON LAW DEPARTMENT

(by Stephen G. Cox, Esq.)  
City Hall, Boston, MA 02201,  
for the Defendants.

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## PROCEEDINGS

MR. COX: I'll put the usual  
stipulations on the record.

MR. HRONES: Yes.

MR. COX: All objections, except as  
to form, are reserved until trial. Motions  
to strike are reserved until trial. Will  
the witness read and sign?

MR. HRONES: Yes.

MR. COX: The witness will read and  
sign. We'll waive the notary. Is 30 days  
okay?

MR. HRONES: Fine.

## IVAN SANTIAGO

A witness called for examination by  
counsel for the Defendants, having been  
first duly sworn, was examined and testified  
as follows:

## DIRECT EXAMINATION

BY MR. COX:

Q. Good afternoon.

A. Hi.

Q. My name is Stephen Cox and I represent the  
City of Boston and Police Officers William

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Testimony of: Direct Cross

Ivan Santiago

(by Mr. Cox) 4

## EXHIBITS

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Feeney and Marcus Eddings. We're going to  
ask you some questions today about the  
complaint that you brought; and before we  
start, I'll just tell you a few groundrules  
to keep in mind so it goes smoothly.

First, have you ever had your  
deposition taken before?

A. Is it what we're doing?

MR. HRONES: Don't ask. Look at  
me. Just listen to him.

Q. Have you ever been questioned in a situation  
like this?

A. Yes.

Q. And when was that?

A. That was when I went to talk to Attorney  
Hrones about this situation.

Q. And aside from that, any other times?

A. No, sir.

Q. Wait until I finish asking a question before  
you give an answer because everything that  
we're saying is being taken down, so we  
don't want to talk over each other. Keep  
your voice up. If at any point you don't  
understand a question or something is not

2 (Pages 2 to 5)

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1 clear for some reason, just let me know and  
 2 I'll rephrase it.  
 3 A. Okay.  
 4 Q. If you don't tell me that, I'll assume that  
 5 you understand the question and you're  
 6 answering truthfully; okay?  
 7 A. Okay.  
 8 Q. If at any point, you would like to take a  
 9 break, if you want some water or you want to  
 10 speak to your attorney, just let me know;  
 11 okay?  
 12 A. Okay.  
 13 Q. What did you do to prepare to come here  
 14 today? Did you speak to anybody about this  
 15 deposition?  
 16 A. No, sir.  
 17 Q. Have you spoken to Jacqueline Lugo about  
 18 this deposition?  
 19 A. No.  
 20 Q. When was the last time you spoke to  
 21 Ms. Lugo?  
 22 A. I think it was the day before Christmas or  
 23 Christmas Eve.  
 24 Q. And where does she live?

Page 7

1 A. She lives in Portland, Maine.  
 2 Q. Do you know her address?  
 3 A. No. I do have it, but I don't know it off  
 4 the top of my head.  
 5 Q. Okay. Did you speak to Rolando Lugo about  
 6 today's deposition?  
 7 A. No. I haven't seen him since the incident.  
 8 Q. You haven't seen him at all since March of  
 9 2003?  
 10 A. Right.  
 11 Q. Was that the last time you spoke to him?  
 12 A. That's the last time I seen or spoke to  
 13 him.  
 14 Q. Do you know where he lives?  
 15 A. No, sir.  
 16 Q. Did you review any documents before coming  
 17 here today?  
 18 A. Yes.  
 19 Q. And what documents did you review?  
 20 A. I don't know how to put it. The same things  
 21 we're doing right now; but I did it with  
 22 Internal Affairs, because it's been a while.  
 23 Q. Sure. The transcript from Internal Affairs?  
 24 A. Thank you. I didn't know what it was

Page 8

1 called.  
 2 Q. That's fine. Anything else?  
 3 A. No, sir.  
 4 Q. Are you currently taking any medications?  
 5 A. No, sir.  
 6 Q. Have you consumed alcohol in the last 24  
 7 hours?  
 8 A. Actually, Saturday.  
 9 Q. That's fine.  
 10 A. Birthday party. It was at a --  
 11 Q. You don't have to explain. And where do you  
 12 currently live?  
 13 A. I stay at 109 Standard Street.  
 14 Q. Stanton?  
 15 A. Standard.  
 16 Q. Standard?  
 17 A. Yes.  
 18 Q. And where is that?  
 19 A. Mattapan, Mass. 02126.  
 20 Q. And whose residence is that?  
 21 A. My girlfriend's, my new girlfriend's.  
 22 Q. And what's her name?  
 23 A. Zulek Perez.  
 24 Q. Zulek?

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1 A. ZULEK, Perez, P E R E Z.  
 2 Q. And how long have you stayed at that  
 3 residence?  
 4 A. Almost a year.  
 5 Q. Okay. And before that, where did you stay?  
 6 A. With Jacqueline.  
 7 Q. And where was that?  
 8 A. It was Strong, Maine.  
 9 Q. And how long did you stay in Strong, Maine?  
 10 A. Not even a year. Almost a year. I can't  
 11 remember. I know it didn't pass a year so  
 12 around a year, around there.  
 13 Q. And before that, did you stay with  
 14 Jacqueline? I'm sorry. Go ahead. Where  
 15 did you stay before that?  
 16 A. Before Maine, we lived at 58 Chaney Street.  
 17 That's where the incident happened.  
 18 Q. So the two of you moved from Chaney Street  
 19 and you went up to Strong, Maine?  
 20 A. To Maine, yes, sir.  
 21 Q. And why did you move to Maine?  
 22 A. Because we had to leave. After the incident  
 23 happened, we had to leave the apartment.  
 24 Q. Okay. We'll talk more about that. Did

3 (Pages 6 to 9)

Page 10

1 someone live in Strong, Maine?  
 2 A. Yes; her mother.  
 3 Q. And that's who you went to live with?  
 4 A. No. We lived with her for a couple of  
 5 months. Her landlord had an extra house  
 6 that we rented out.  
 7 Q. Okay. Why did you leave Strong, Maine?  
 8 A. I left because it's stressful. I mean, I  
 9 couldn't find a job. It was just too  
 10 stressful, too hectic, and I decided to go  
 11 out and find myself, try to do what I have  
 12 to do, and I was honest and I told her, "I  
 13 want to leave. I want to get out."  
 14 Basically, it was between us. It has  
 15 something to do with the case; but then,  
 16 again, it was personal stuff between us.  
 17 Q. Okay. And so when you came back, you came  
 18 back to live in Mattapan?  
 19 A. With my mother, yes. That's where my mother  
 20 lives.  
 21 Q. So you lived with your mother for a short  
 22 time and then moved with a new girlfriend?  
 23 A. Yes.  
 24 Q. And do you have any children?

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1 A. Three.  
 2 Q. And what are their names and ages?  
 3 A. I got two with Jackie and one with my new  
 4 girlfriend now, so my oldest son's name is  
 5 Gabriel. I've got a little daughter named  
 6 Dream. And my new son is named Romeo.  
 7 Q. And could you just tell me your education?  
 8 Did you go to school in the Boston area?  
 9 A. Yes. I went to Dorchester High.  
 10 Q. Did you graduate from there?  
 11 A. No.  
 12 Q. And when did you leave Dorchester High?  
 13 A. I left in my junior year.  
 14 Q. And can you tell me, do you currently work?  
 15 A. No. I just recently went -- I was supposed  
 16 to go to a job interview today, but instead,  
 17 I had to come here. So I got to go sometime  
 18 this week.  
 19 Q. Okay. When was the last time you worked?  
 20 A. A long time. A long time.  
 21 Q. If you remember.  
 22 A. I would say, I think it was -- that happened  
 23 in '98. I would say 2002. It was before  
 24 the incident. I used to work at Stop &

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1 Shop. It was before the incident.  
 2 Q. Have you ever been a Plaintiff in a lawsuit  
 3 before?  
 4 A. No. This is the first time.  
 5 Q. Have you ever had any claims against the  
 6 City of Boston or any other municipality?  
 7 A. No, sir.  
 8 Q. Have you ever been a Defendant in a civil  
 9 lawsuit?  
 10 A. No, sir.  
 11 Q. Have you ever been arrested?  
 12 A. Yes and no, because I was a juvenile. I was  
 13 13. I was skipping school. I was at  
 14 Forrest Hills Station and at the time, they  
 15 said that no kids -- they didn't catch any  
 16 kids in any T stops, that they are going to  
 17 arrest them and have their parents come up  
 18 so that's what happened. But ever since  
 19 then, no.  
 20 Q. Other than that, nothing?  
 21 A. Other than that, nothing.  
 22 Q. Okay. Do you have a primary care physician  
 23 or a doctor that you see regularly?  
 24 A. No. I haven't been to a physician or to a

Page 13

1 doctor since the age of 12.  
 2 Q. Since the age of 12?  
 3 A. Yes.  
 4 Q. Have you had to go to a hospital for any  
 5 reason?  
 6 A. Yes. I had tonsillitis. This was like this  
 7 past summer. Yes, this past summer.  
 8 Q. Other than that, have you ever been to a  
 9 hospital?  
 10 A. No, sir.  
 11 Q. Okay. We're here for an incident that  
 12 occurred on March 20th, 2003, correct?  
 13 A. Yes.  
 14 Q. And this incident occurred at 58 Chaney  
 15 Street?  
 16 A. Yes.  
 17 Q. And you said before that this is where you  
 18 lived?  
 19 A. Yes.  
 20 Q. And who else lived at that address at the  
 21 time of this incident?  
 22 A. Jackie, Jacqueline, my X girlfriend; my son;  
 23 and her brother occasionally stayed. He  
 24 came and left.

4 (Pages 10 to 13)



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1 Q. And when you say, "occasionally," at the  
2 time in March of 2003, was 58 Chaney Street  
3 where he slept every night?  
4 A. No. That morning, he just came in, like  
5 around 10:00. Then a half hour later,  
6 10:30, that's when it all happened. He just  
7 came in.  
8 Q. During this time period, was there any night  
9 of the week that he would sleep over?  
10 A. Oh, yes. Of course. I would say two or  
11 three times out of a week, he stayed.  
12 Q. And your son, Gabriel, was there?  
13 A. Yes.  
14 Q. And do you remember what time the police  
15 arrived, approximately?  
16 A. 10:30.  
17 Q. I'm going to hand you a piece of paper, and  
18 this isn't to test your artistic skills, but  
19 just to make my questions easier about what  
20 happened. You can take that pen. What I  
21 would like you to do is just using that  
22 whole sheet of paper, if you could just draw  
23 the general diagram of 58 Chaney Street, the  
24 apartment that you were in when the police

Page 16

1 A. Is nothing. It's like a wall here. Once  
2 you come in, you see the living room right  
3 here. It's a pretty big living room. Then  
4 when you go into the saloon, you take a  
5 left. That's where my son's room is at.  
6 Then if you come down, because there are no  
7 doors in between, everything just leads --  
8 the only door is just the main door, the  
9 back door, which is right here, and the  
10 kitchen, my son's room, the bathroom, and  
11 our bedroom. That's it.  
12 Q. Okay. So tell me the first thing that you  
13 remember happening when the police arrived.  
14 A. Well, they came in through the main  
15 entrance. Me and my brother-in-law at the  
16 time, Rolando, we were playing video games.  
17 MR. HRONES: Do you want him to  
18 still use the drawing or not?  
19 MR. COX: Yes.  
20 Q. As we talk about him, I might ask you to  
21 mark more. So you and Rolando were in the  
22 living room playing video games?  
23 A. Yes.  
24 Q. And what was the first thing you heard or

Page 15

1 came, so I can use that.  
2 A. The inside or the outside?  
3 Q. The inside. Just the inside of the  
4 apartment, the rooms.  
5 A. You come in, there is a little hallway  
6 here. The bathroom is here, our bedroom,  
7 and there is the middle room, because once  
8 you go in, there is a little -- it's like a  
9 little main entrance. Like when you come in  
10 like this, it's like this. Then a little  
11 hallway. There is the kitchen. The  
12 bathroom is in the hallway and then you go  
13 into the living room, and then that's where  
14 you go in the living room. My son's room is  
15 right next to the TV. It's a two-bedroom  
16 apartment. There is one next to the  
17 bathroom and this one is off the living  
18 room.  
19 Q. And just mark "living room" where that is.  
20 A. (Witness complies)  
21 Q. So the living room is at the very end of the  
22 hallway?  
23 A. Yes, sir.  
24 Q. And this area here is nothing?

Page 17

1 how did you first come to know that police  
2 were in the apartment?  
3 A. My girlfriend was in the kitchen at the  
4 time; and she seen them coming, because it's  
5 a big building so it has an entrance through  
6 the back. It has an entrance through the  
7 back. Once you go through the back door of  
8 the kitchen, there is a little hallway that  
9 was leading to the second and third floors  
10 and it leads to the back. So when you go  
11 out to take out the trash and everything,  
12 you go through the back. That hallway leads  
13 to this door, too. You can go around. So  
14 we had two entrances to the apartment, the  
15 main door and the back door, but they came  
16 in through the back of the building, but not  
17 through the back door to our apartment, and  
18 went around and came through the front.  
19 Q. So Jacqueline was in the kitchen and --  
20 A. Yes.  
21 Q. And where was Gabriel?  
22 A. With her. So she saw them. She came to  
23 tell us that the police are about to raid  
24 somebody in the facility. I can't remember

5 (Pages 14 to 17)

Page 18

1 exactly what she said, but she said  
 2 something around there.  
 3 Q. Did she actually come physically? Did she  
 4 reach the living room?  
 5 A. Yes. She came to us because we had the  
 6 shades up and everything. She saw them and  
 7 she came and told us. Now it's coming  
 8 back. One of the officers heard her so  
 9 that's when they just came. I don't even  
 10 know how they even got in because the top  
 11 lock was locked. The bottom lock is not  
 12 even a lock. It's just a top one.  
 13 Q. I'm going to take you back a little to make  
 14 sure we cover everything. You're in the  
 15 living room with Rolando playing video  
 16 games?  
 17 A. Yes.  
 18 Q. And Jacqueline comes to the living room and  
 19 says something along the line -- tell me  
 20 again the gist of what she said.  
 21 A. She was in the kitchen. I forgot what she  
 22 was doing, but she saw the cops come in  
 23 through the back entrance of the apartment.  
 24 Of the building. I'm sorry. Of the

Page 19

1 building. Then she saw them. She came to  
 2 us. We were in the sitting room and she  
 3 said that there are cops here, that they are  
 4 about to raid somebody in the facility.  
 5 Q. And was Gabriel with her?  
 6 A. Yes.  
 7 Q. Was she holding him?  
 8 A. Yes.  
 9 Q. And after she says this, what's the next  
 10 thing you remember happening after she says  
 11 that?  
 12 A. Of the cops coming into the apartment.  
 13 Q. And so when the police came into the  
 14 apartment, you, Rolando, Jacqueline, and  
 15 Gabriel were in the living room?  
 16 A. No. She was right here.  
 17 Q. You are just indicating sort of just in  
 18 through the main --  
 19 A. Yes. Like the little main hall. We were in  
 20 the living room. She was like in between  
 21 the living room and the main entrance. Like  
 22 right here, basically.  
 23 Q. And it's from that location just outside the  
 24 living room that she said something to you

Page 20

1 and Rolando?  
 2 A. Yes.  
 3 Q. And was it immediate then; as soon as she  
 4 said that, did you actually see the police  
 5 officers or did you hear something first?  
 6 A. It kind of happened too fast. Once she said  
 7 that, it's just like a matter of three  
 8 seconds, they already were coming in through  
 9 the door.  
 10 Q. And what's the next thing that you remember  
 11 happening?  
 12 A. Once they came in, they told us, "Put your  
 13 hands up." They came and put Rolando in  
 14 handcuffs. Then they put me in handcuffs.  
 15 Then they showed us the warrant. They said,  
 16 "We have warrants to search the facility."  
 17 They showed Jacqueline. They showed her.  
 18 Then they separated us. They took her.  
 19 Q. So how many officers do you remember coming  
 20 into the living room area?  
 21 A. About seven, eight officers.  
 22 Q. And so as soon as they came in, they  
 23 handcuffed you and Rolando?  
 24 A. They handcuffed him first and me.

Page 21

1 Q. Where were you and Rolando sitting when you  
 2 were playing the video games?  
 3 A. We were in the living room. I think we were  
 4 on the floor, I think. Yes, I was on the  
 5 floor. He was like right next to me, but  
 6 not sitting down.  
 7 Q. Did they give you any instructions? Did  
 8 they tell you to turn around?  
 9 A. They put us on the floor. They just lied us  
 10 down straight on our bellies and put our  
 11 hands behind our backs and handcuffed us.  
 12 Q. When they first came into the living room,  
 13 they had both of you lay on the floor?  
 14 A. Yes.  
 15 Q. Did you see what happened to Jacqueline when  
 16 they came in?  
 17 A. They took her and took her to our bedroom.  
 18 Q. So after you and Rolando were handcuffed on  
 19 the ground, what happened?  
 20 A. They separated us. They took him into my  
 21 son's room. Then they took me and set me  
 22 down on the sofa in the living room.  
 23 Q. And you said before they separated you, they  
 24 said that they had a search warrant or was

6 (Pages 18 to 21)

Page 22

1 that after you were separated?

2 A. This was before. Before we all were

3 separated, they showed us -- I don't really

4 know nothing about the search warrant

5 because we were --

6 Q. Were you still on the ground when they said

7 that or had they lifted you up to stand up?

8 A. They already had me sitting down.

9 Q. Was it immediately after they handcuffed you

10 that they stood you up and put you on the

11 sofa?

12 A. Yes.

13 Q. And was Rolando on the sofa, too, before

14 they separated you?

15 A. No. Once they handcuffed both of us, they

16 stood him up, took him into my son's room

17 and took me into the living room to the

18 sofa, which is a couple of steps, two

19 steps.

20 Q. And were you able to see into -- can you see

21 into your son's room from the living room?

22 A. Yes, because it's like I'm sitting right

23 here and that's my son's door. And then I

24 could look. I can't look into our bedroom

Page 23

1 because I was sitting like right here. I

2 could see my son's room. I could also see

3 everything else, so I had a clear view of

4 everything.

5 Q. Just make a "1" where you were sitting.

6 A. I was right there.

7 Q. Circle that.

8 A. Okay.

9 Q. Okay. Just so it's clear later on when

10 we're looking at it, if we need to.

11 And what else do you remember,

12 then? They said they had a search warrant?

13 Did they say anything else to you?

14 A. No. They didn't speak to me about the

15 search warrant. It was Jacqueline at the

16 time.

17 Q. It was Jacqueline?

18 A. Yes, because that's all I heard. Once they

19 handcuffed us, that's all I heard. She was

20 the only one there. They said, "We have a

21 search warrant to search the apartment."

22 Q. So they didn't say that to you; they were

23 saying that to Jacqueline and you overheard

24 it?

Page 24

1 A. Yes.

2 Q. And could you hear it because Jacqueline was

3 standing just outside?

4 A. Yes. Exactly.

5 Q. And you heard them say they had a search

6 warrant?

7 A. Yes.

8 Q. Did you hear them say anything else?

9 A. No. After that, I couldn't believe it.

10 Q. When you were seated on the sofa in the

11 living room, how many -- when you were

12 seated on the sofa and separated from

13 Rolando, how many officers were in the

14 living room?

15 A. I would say about six. Six to seven,

16 because it was eight. I know it was around

17 eight officers, but there was like two with

18 him and the rest were in the living room

19 area searching around.

20 Q. So two officers took Rolando into your son's

21 room?

22 A. Yes.

23 Q. And then there were other officers? Did the

24 number change? Was it the same officers who

Page 25

1 stayed in the living room or were there

2 different ones coming and going?

3 A. They were coming in and out. From when they

4 came in, there were at least eight, but I

5 know there were some more outside probably.

6 I'm just making a suggestion, because a few

7 of them came in. It was so much.

8 Q. After the police officers told Jacqueline

9 that they had a search warrant, what did

10 they do with her?

11 A. They took her into our bedroom. I don't

12 know what happened in there at all.

13 Q. From where you were sitting in the living

14 room, could you see your bedroom?

15 A. Yes.

16 Q. Down the hall?

17 A. Yes, I could see the bedroom door, but I

18 couldn't see inside.

19 Q. And what's the next thing you remember

20 happening?

21 A. They frisked me. One cop frisked me.

22 Q. Was this after you had been seated on the

23 sofa?

24 A. Yes. This is after I had been seated.

7 (Pages 22 to 25)



Page 26

1 About three different officers frisked me.  
 2 Q. And when you were frisked, were you told to  
 3 stand up?  
 4 A. Yes.  
 5 Q. And how did they frisk you? What did they  
 6 do?  
 7 A. They just do it normally. They checked my  
 8 pockets. They asked me if I had any weapons  
 9 or sharp objects. I said, "No." It was  
 10 just a normal frisk.  
 11 Q. And had you been frisked before, when you  
 12 say "normal"?  
 13 A. Yes. Of course. I mean, not like on the  
 14 street. Cops come, whatever. They just  
 15 frisk you.  
 16 Q. And you said you were searched, frisked  
 17 about three times?  
 18 A. I was frisked three times, yes. Exactly  
 19 three times.  
 20 Q. And did any of the officers say anything to  
 21 you while they were frisking you?  
 22 A. I don't remember.  
 23 Q. Do you remember saying anything to them  
 24 while they were frisking you?

Page 27

1 A. No.  
 2 Q. And what's the next thing you remember  
 3 happening after you were frisked? Let's  
 4 just stop it at this point. How much time  
 5 has passed from when the police came into  
 6 the apartment to the time that you were  
 7 searched the third time?  
 8 A. About 15, 20 minutes.  
 9 Q. Okay. So what happened after that?  
 10 A. After the third time I got frisked, after  
 11 they all already destroyed our apartment,  
 12 they searched everything. After they  
 13 frisked me for the third time, they take  
 14 them. They were searching my son's room.  
 15 They took him.  
 16 Q. "Him" being Rolando?  
 17 A. Yes, Rolando. They took him. Then after  
 18 they took him, four officers left. There  
 19 were two Caucasians, one Hispanic, and one  
 20 black man.  
 21 Q. Now, when you were sitting during this  
 22 period where you were sitting in the living  
 23 room, did you hear any conversation in your  
 24 son's room between the officers and Rolando?

Page 28

1 A. No, sir.  
 2 Q. And there were two officers in your son's  
 3 room with Rolando?  
 4 A. Yes.  
 5 Q. And was it the same two the whole time?  
 6 A. I don't know. I just seen two. While I was  
 7 getting frisked, everybody was moving around  
 8 so it was hard. I'm just saying from when  
 9 it first happened, that's what I seen.  
 10 Q. And then those same two officers took  
 11 Rolando out of your son's room?  
 12 A. Yes.  
 13 Q. And how long had they been in that room with  
 14 Rolando?  
 15 A. I would say five to ten minutes tops.  
 16 Q. And were they within your sight the whole  
 17 time or was there any point where you  
 18 couldn't see what was going on?  
 19 A. The door was closed.  
 20 Q. They closed the door?  
 21 A. Once they took him in there, they closed the  
 22 door. I didn't hear nothing. I didn't see  
 23 nothing. I just saw when they went in and  
 24 they took him out.

Page 29

1 Q. So the two officers went into your son's  
 2 room with Rolando, closed the door, and then  
 3 the next time it opened, the same two  
 4 officers came out with him?  
 5 A. (Witness shakes head)  
 6 Q. I'm sorry. Is that what happened?  
 7 A. Yes.  
 8 Q. And when the officers came out with him,  
 9 where did they go?  
 10 A. They took him outside.  
 11 Q. So they went out the main door?  
 12 A. Outside. What happened after that, I don't  
 13 know.  
 14 Q. And at the point where they took him  
 15 outside, where was Jacqueline? Do you  
 16 know? Was she still --  
 17 A. No.  
 18 Q. -- in the bedroom?  
 19 A. No.  
 20 MR. HRONES: Wait until he finishes  
 21 the question. She's got to take it down.  
 22 Wait.  
 23 Q. Just so we're not talking over each other.  
 24 I know it's hard.

8 (Pages 26 to 29)



Page 30

- 1 A. At that point, when they took him, they  
2 brought her up.  
3 Q. Was that before or after they took Rolando  
4 out, if you remember?  
5 A. She was there before they took him out. I  
6 was on the same spot on the sofa the whole  
7 time. They brought her out. She sat about  
8 like a good angle from me.  
9 Q. In the hallway?  
10 A. In the hallway, yes. There was a little  
11 brown chair.  
12 Q. You made a star with a circle around it.  
13 There was a chair in the hallway and was she  
14 handcuffed when they brought her out of the  
15 bedroom?  
16 A. No. She wasn't handcuffed at all.  
17 Q. At any point, did you see her handcuffed?  
18 A. No, she was not.  
19 Q. When they brought her out of your bedroom,  
20 where was Gabriel?  
21 A. With her.  
22 Q. Was Gabriel with her the whole time?  
23 A. Yes.  
24 Q. So she was holding him?

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- 1 A. Yes.  
2 Q. How old was he at the time?  
3 A. Two years old.  
4 Q. And she sat in that chair in the hallway; is  
5 that right?  
6 A. She sat down on that chair with my son on  
7 her lap.  
8 Q. And it was after that that the officers came  
9 out of your son's room with Rolando?  
10 A. Yes, sir.  
11 Q. And after they left, what's the next thing  
12 that happened?  
13 A. That's when the Hispanic cop came and told  
14 the black cop that was next to me to go take  
15 him to the bathroom and search him.  
16 Q. Do you remember those specific words?  
17 A. Yes.  
18 Q. Anything else?  
19 A. No.  
20 Q. Before this was said, you said that the  
21 black officer was standing next to you?  
22 A. Yes.  
23 Q. And you were seated?  
24 A. Yes.

Page 32

- 1 Q. And how long had he been there standing next  
2 to you?  
3 A. After the third frisk, it's like they -- how  
4 do you say it? They designated him to watch  
5 me just in case if anything happened, he  
6 was -- all three of them, they put him to  
7 watch me, basically.  
8 Q. Is that because something was said or you're  
9 just kind of assuming based on how it  
10 happened? I'm just wondering if anything  
11 was said to the officer about watching you  
12 or anything like that.  
13 A. No. He just told him to watch him and once  
14 they were searching the house, the sofa,  
15 everything, the rooms, once they took him,  
16 the Hispanic cop was right in front of my  
17 son's door. I could see him. He told the  
18 officer standing next to me to take me to  
19 the bathroom and search me.  
20 Q. And he actually said, "Take him to the  
21 bathroom"?  
22 A. Yes.  
23 Q. And could you describe what that officer  
24 looked like? You called him an Hispanic?

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- 1 A. He was short. He had short hair. No  
2 glasses. He had no facial hair. He was  
3 kind of a little bit chubby. I can't say  
4 fat or husky. He was a little bit chubby.  
5 Q. When you say, "Hispanic," what makes you say  
6 he's Hispanic?  
7 A. Because he spoke Spanish to us. He was  
8 speaking Spanish to Jacqueline.  
9 Q. And what was he saying when he was speaking  
10 Spanish?  
11 A. I don't know.  
12 Q. Do you speak Spanish?  
13 A. Yes. Of course.  
14 Q. Could you hear what he was saying?  
15 A. I was hearing but at the time, I couldn't  
16 understand what he was saying. Like it was  
17 too much noise. I just heard him and she  
18 was talking back to him. I was still here.  
19 He's there talking to her. Then every other  
20 cop is talking. So it's hard to hear, but I  
21 heard him. That's all I heard him say.  
22 Q. When he was talking to her, was that when  
23 she was seated in the hallway?  
24 A. Yes, sir.

9 (Pages 30 to 33)

Page 34

- 1 Q. So after Rolando was taken out, this officer  
2 says to the black officer to take you to the  
3 bathroom and search you?  
4 A. Yes, sir.  
5 Q. And was Jacqueline still seated in the  
6 hallway --  
7 A. Yes.  
8 Q. -- at that time?  
9 A. Yes.  
10 Q. And was there anyone else in the living room  
11 other than the black officer? You said  
12 there were four officers total?  
13 A. Yes, four officers.  
14 Q. Where were the other two officers when this  
15 was said?  
16 A. It was in the little main entrance. Right  
17 here, I suppose.  
18 Q. You just made a line just inside the main  
19 door?  
20 A. Yes.  
21 Q. That's where the other two officers were?  
22 A. Yes.  
23 Q. And was the Hispanic officer the same  
24 officer who told Jacqueline in the beginning

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- 1 that they had a search warrant?  
2 A. I didn't see that. I didn't see who said  
3 what. I just heard it.  
4 Q. You just heard that?  
5 A. Yes.  
6 Q. Okay. So after the Hispanic officer told  
7 the black officer to take you to the  
8 bathroom and search you, what happened  
9 next?  
10 A. The officer told me to get up. I got up.  
11 We get to the door in the bathroom, takes  
12 off my cuffs, we go in, and he tells me to  
13 take off piece by piece first.  
14 Q. I'll just stop you there. How was he  
15 dressed, the black officer?  
16 A. He was not in uniform.  
17 Q. He wasn't in uniform?  
18 A. No, he wasn't in uniform.  
19 Q. Did you notice any of the officers wearing  
20 gloves?  
21 A. All of them.  
22 Q. All of them?  
23 A. Yes.  
24 Q. Including the black officer?

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- 1 A. Yes. Every officer in the house was wearing  
2 gloves.  
3 Q. Okay. Did the black officer say anything to  
4 you from the time -- were you handcuffed  
5 behind your back?  
6 A. Yes.  
7 Q. And so you stood up and walked with the  
8 officer to the bathroom in front of the  
9 bathroom?  
10 A. Mm-hmm.  
11 Q. Yes?  
12 A. Yes.  
13 Q. And did he say anything to you in the  
14 hallway before you reached the door?  
15 A. I don't remember, honestly.  
16 Q. So you would have walked past Jacqueline?  
17 A. Walked past Jacqueline and the two officers.  
18 Q. And Jacqueline was seated there with  
19 Gabriel?  
20 A. Yes.  
21 Q. And was there an officer standing with her,  
22 too?  
23 A. No.  
24 Q. She was just by herself?

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- 1 A. By herself.  
2 Q. And what happened to the Hispanic officer  
3 after he said that to the black officer?  
4 A. He was still on the same spot in front of my  
5 son's door. That's the last time I seen  
6 him. When he said that, he picked me up and  
7 we left. I didn't see him move or  
8 anything. That was the last place where I  
9 seen him at.  
10 Q. And so the black officer took the handcuffs  
11 off of you before you went into the  
12 bathroom?  
13 A. Yes, sir.  
14 Q. And he kept the handcuffs on him?  
15 A. Yes, he did.  
16 Q. Okay. You then went into the bathroom?  
17 A. Mm-hmm.  
18 Q. You have to answer yes or no.  
19 A. Yes.  
20 Q. And what happened? Was the door closed?  
21 A. Yes. He closed the door.  
22 Q. He closed the door?  
23 A. Yes.  
24 Q. And did he close it all the way or did he

10 (Pages 34 to 37)

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1 leave it a little bit open?  
 2 A. He closed it all the way.  
 3 Q. What's the next thing that you remember  
 4 happening?  
 5 A. He's telling me to take off my clothes piece  
 6 by piece. Shirt first. I took off my  
 7 shirt. Then he searched the shirt, went  
 8 like, you know. Then he told me --  
 9 Q. So you took off your shirt and handed it to  
 10 him?  
 11 A. Yes. He searched it. Then he told me to  
 12 take -- I had jeans. I took off my jeans,  
 13 and he searched the pants. Then I had  
 14 basketball shorts under. I took them off.  
 15 He searched them. Then I had boxers. I  
 16 took them off, and he searched them. Then  
 17 he told me to turn around. From the time he  
 18 told me to turn around, I was facing the  
 19 tub. It's a pretty small bathroom. It's  
 20 pretty small.  
 21 Q. When you walk in the bathroom door, what's  
 22 straight ahead of you when you walk in the  
 23 bathroom door?  
 24 A. As you walk in, the tub, the toilet, and the

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1 sink.  
 2 Q. So the tub is right in front of you and then  
 3 on the wall to your left is the sink?  
 4 A. And then right next to it is the toilet.  
 5 Q. And the toilet is in between the sink and  
 6 the tub?  
 7 A. Yes.  
 8 Q. And at the time, as the officer was telling  
 9 you to remove the articles, your articles of  
 10 clothing, where was he standing?  
 11 A. Right behind. Like when we came in the  
 12 door, he was right here.  
 13 Q. So his back was towards the wall?  
 14 A. Towards the door, yes.  
 15 Q. And you were standing between the officer  
 16 and the tub?  
 17 A. Yes.  
 18 Q. Okay.  
 19 A. So then he tells me to turn around. So at  
 20 the time he tells me to turn around, I'm  
 21 facing the tub and he tells me to bend over  
 22 and spread them.  
 23 Q. Before that, had he said anything else to  
 24 you?

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1 A. No, sir.  
 2 Q. Was he giving instructions about what to do  
 3 with your clothes, what to take off?  
 4 A. Yes. Just one item at a time. It was the  
 5 shirt first, then hand it over, the pants.  
 6 Just like that. One item at a time.  
 7 Q. And he was wearing gloves?  
 8 A. Yes, sir.  
 9 Q. And when you would hand him an article of  
 10 clothing, he would search, like he would  
 11 give you the pants? He looked in the  
 12 pockets?  
 13 A. Yes. He searched everything. He searched  
 14 the pants, everything.  
 15 Q. And other than giving you instructions about  
 16 what articles of clothing to take off, did  
 17 he say anything else to you?  
 18 A. No, sir.  
 19 Q. Okay. And when he told you to bend over,  
 20 what did you physically do? Did you lean on  
 21 the tub?  
 22 A. No, I didn't lean. I just bent over exactly  
 23 like -- I put my hands on the tub and he  
 24 told me to spread them, so I was like this

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1 and I spread my cheeks.  
 2 Q. When he told you to turn around, you're  
 3 facing the tub and you took your hands and  
 4 you put them on the edge of the tub?  
 5 A. Yes, sir.  
 6 Q. And tell me what you did.  
 7 A. Then he told me to spread them, and I  
 8 grabbed my hands and spread my cheeks.  
 9 That's when he looked and I just felt like  
 10 about an inch, like that, go in and go  
 11 around. You don't mind if I demonstrate?  
 12 Q. No.  
 13 A. He just went like this and went like this  
 14 around.  
 15 Q. Just for the record, because obviously, this  
 16 isn't going to be on the record, you're  
 17 taking your middle finger and you're sort of  
 18 putting it into your other hand, your thumb  
 19 and your forefinger about up to the first  
 20 joint; is that fair?  
 21 A. Yes.  
 22 Q. And you just did a movement with your hand,  
 23 your right hand?  
 24 A. Yes.

11 (Pages 38 to 41)

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- 1 Q. Could you just do that again so I could  
2 describe it?
- 3 A. Like when you are trying to clean a bottle  
4 or something, wiping something off like  
5 that, just like that.
- 6 Q. And so you just turned your right hand just  
7 sort of a half -- if it's a clock, you just  
8 went from six o'clock to nine o'clock and  
9 then back around to three o'clock?
- 10 A. Basically, yes.
- 11 Q. Where were your hands when he did this?
- 12 A. They were on my cheeks.
- 13 Q. So you were standing up?
- 14 A. No. I was bending over.
- 15 Q. And with both of your hands?
- 16 A. Yes. I was bending over just like this and  
17 my hands were on my cheeks.
- 18 Q. Okay. I know it's hard. I appreciate you  
19 telling me.
- 20 Now, after he did that, did he say  
21 anything to you?
- 22 A. Just to put my clothes back on.
- 23 Q. And what did he do, if anything?
- 24 A. He took off his gloves and threw them on the

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- 1 floor.
- 2 Q. He threw them on the floor?
- 3 A. Yes.
- 4 Q. Is that all he said to you, to put your  
5 clothes back on?
- 6 A. Yes, sir.
- 7 Q. And so you put your clothes back on and  
8 what's the next thing that happened?
- 9 A. He handcuffs me again. Then we go back to  
10 the original spot where I was sitting at in  
11 the living room.
- 12 Q. And when you came out of the bathroom, was  
13 Jacqueline still seated there with Gabriel?
- 14 A. Yes, sir.
- 15 Q. And did you see any of the other three  
16 officers when you first came out of the  
17 bathroom?
- 18 A. Yes, sir. I seen the same three officers  
19 over there.
- 20 Q. And were they in the same spots, because  
21 before you went in, the Hispanic officer was  
22 outside of your son's room; is that right?
- 23 A. Yes, sir.
- 24 Q. And was he still there when you came out?

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- 1 A. He was with the other two officers.
- 2 Q. He was over with the two officers in front  
3 of the main entrance area?
- 4 A. Yes, sir.
- 5 Q. And then the black officer walked you over  
6 to the couch where you had been seated  
7 before?
- 8 A. Yes, sir.
- 9 Q. And what happened?
- 10 A. The other officers asked him if he's clean  
11 or not. You know, he said, "Yes, he's  
12 clean. He has nothing."
- 13 Q. And you remember those words being spoken?
- 14 A. Yes.
- 15 Q. Do you remember which officer asked that?
- 16 A. No, I don't.
- 17 Q. Was that before you were seated that you  
18 heard that being said?
- 19 A. It was after I was seated because I sat  
20 down. Then he was next to me and the cops  
21 asked him. He said, "He's clean."
- 22 Q. And then what happened?
- 23 A. And then it was over. It was done. They  
24 done the search. They did it all, and they

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- 1 uncuffed me.
- 2 Q. Do you remember who uncuffed you?
- 3 A. That same officer.
- 4 Q. After he said, "He's clean," about how long  
5 after that did he uncuff you?
- 6 A. I would say not even five minutes. Three or  
7 four minutes, around there. It's been so  
8 long.
- 9 Q. And then after you were unhandcuffed, did  
10 you stay seated on the couch?
- 11 A. Yes.
- 12 Q. And when you were unhandcuffed, Jacqueline  
13 and Gabriel were still seated in the hallway?
- 14 A. Yes.
- 15 Q. And what's the next thing that happened?
- 16 A. They left.
- 17 Q. So right after you were unhandcuffed, they  
18 left?
- 19 A. Yes. They basically left.
- 20 Q. And was anything said to you or to  
21 Jacqueline before they left?
- 22 A. I think they told her that they had to  
23 notify DSS for the child care. I think it's  
24 DSS.

12 (Pages 42 to 45)



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1 Q. Yes.  
 2 A. That they had to notify them, let them know  
 3 that there was a child at the time where  
 4 they were doing the raid. I don't know  
 5 which word he used, but what they were doing  
 6 with the raid. She was like, "Okay. It's  
 7 fine."  
 8 Q. And when they left, were you aware that  
 9 drugs had been found in the apartment?  
 10 A. Oh, yes.  
 11 Q. When did you first become aware of that?  
 12 A. After they left, her brother called.  
 13 Q. So at the moment that the police left the  
 14 apartment, did you know that drugs had been  
 15 found in the apartment?  
 16 A. I don't remember if it was before or after,  
 17 because I know after he called, he spoke to  
 18 her and let her know what happened, what  
 19 they found, because they found drugs in his  
 20 rectum. That's why the Hispanic officer  
 21 told the black officer to come and check me  
 22 because right after they took him from my  
 23 son's room, the Hispanic officer told him to  
 24 go in the bathroom and search me, but I

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1 didn't find out until her brother called.  
 2 Q. So how long after the police left did  
 3 Rolando call the apartment?  
 4 A. Five minutes.  
 5 Q. And when he called, did you speak to him at  
 6 all?  
 7 A. No.  
 8 Q. Where was the phone in the apartment, if you  
 9 remember?  
 10 A. We had a cordless.  
 11 Q. And so Jacqueline answered the phone?  
 12 A. Yes.  
 13 Q. And were you aware that she was speaking to  
 14 Rolando?  
 15 A. Yes.  
 16 Q. And what do you remember hearing her say to  
 17 him?  
 18 A. She was telling him about the house. They  
 19 broke this, they broke that. Simple stuff,  
 20 but I can't remember anything besides that.  
 21 I can't.  
 22 Q. Okay. And just to back up, because we  
 23 skipped over, when the officers left the  
 24 apartment, what's the first conversation --

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1 what was the first thing that was said  
 2 between you and Jacqueline?  
 3 A. I let her know what just happened.  
 4 Q. And what do you remember saying to her  
 5 specifically?  
 6 A. That when he took me to the bathroom, he  
 7 told me to take off my clothes piece by  
 8 piece, told me to bend over, and I told her  
 9 that he stuck his finger up. That's what I  
 10 told her.  
 11 Q. And when you were telling her this, where  
 12 were you? Were you in the living room?  
 13 A. Yes. We were in the same facility right  
 14 here. She was right there talking on the  
 15 phone.  
 16 Q. So in the same area?  
 17 A. Yes.  
 18 Q. And this was a conversation that you had  
 19 with Jacqueline before Rolando called?  
 20 A. Yes, so then when he called --  
 21 Q. I'm sorry to interrupt, but did she tell you  
 22 that any drugs had been found?  
 23 A. Yes. She asked her brother, "Did they find  
 24 anything?" And then he said, "Yes. They

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1 found drugs in my son's stuffed animal."  
 2 That's where he was keeping it at.  
 3 Q. Are you aware that any ammunition was found  
 4 in a hole in the wall?  
 5 A. Yes.  
 6 Q. And was that in the living room?  
 7 A. That was behind where I was. That was  
 8 behind where I was. I was sitting on this  
 9 sofa. Behind me, there was this thing.  
 10 That hole was already there, but we did know  
 11 about that and stuff.  
 12 Q. So you were there when the police found  
 13 that?  
 14 A. Yes.  
 15 Q. To your understanding, did they find that on  
 16 their own or did they specifically go there  
 17 to find the hole?  
 18 A. Jacqueline told them.  
 19 Q. Jacqueline told them where it was?  
 20 A. Yes.  
 21 Q. Okay. So after Jacqueline spoke to Rolando,  
 22 did she tell you anything that he said?  
 23 A. Let me see if I can remember. She told him  
 24 about what happened to me. Then I think

13 (Pages 46 to 49)

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1 from what she said, that he spoke to his  
 2 lawyer or something, and said that he was  
 3 going to speak because he didn't know that  
 4 that was the right thing. I thought it was  
 5 part of the procedure, to tell you the  
 6 truth. They ran my name. I told her that  
 7 was the first time that ever happened to  
 8 me. So I thought it was part of the  
 9 procedure. So she felt like it wasn't.  
 10 They raided my house. I was clean. They  
 11 frisked me three times. I had nothing to do  
 12 with the whole incident. I wasn't the one  
 13 that they were looking for; but yes, yet,  
 14 they still went ahead with the cavity  
 15 search.  
 16 Q. And you said they ran your name. When did  
 17 they do that?  
 18 A. After the second frisk, they ran my name.  
 19 Then they ran her name at the same time.  
 20 Q. And how did they do that? Did they have --  
 21 A. They had walkie-talkies or whatever you call  
 22 them things.  
 23 Q. So the officer who was in the living room  
 24 kind of called in your --

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1 A. My name.  
 2 Q. And how did he get your information? Did  
 3 the officer just ask you?  
 4 A. Yes.  
 5 Q. Did he take any identification from you?  
 6 Was any identification taken from you at any  
 7 point?  
 8 A. I don't remember if I gave him my license or  
 9 not. They just asked me for my name. Yes,  
 10 he just asked me for my name, and they ran  
 11 it down and it came out clean.  
 12 Q. I'm sorry. So you were telling me what she  
 13 was telling you that Rolando said and there  
 14 was something about him speaking to his  
 15 lawyer?  
 16 A. About a lawyer to see if what happened to me  
 17 was accurate or not; and basically, he spoke  
 18 to -- I think he called -- I don't know when  
 19 was the next time he called, but I know he  
 20 called. I wasn't there because after this,  
 21 I was stressing.  
 22 Q. Well, just to try and take this  
 23 chronologically so it makes sense, after  
 24 Rolando called and Jacqueline spoke to him,

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1 what's the next thing that you remember  
 2 happening?  
 3 A. They were just talking.  
 4 Q. So she gets off the phone and she tells  
 5 you --  
 6 A. What he said.  
 7 Q. Did the two of you stay in the apartment  
 8 that day?  
 9 A. Yes. We cleaned up the apartment; and later  
 10 on that night, she called her mother.  
 11 Q. Later on that night?  
 12 A. Around eight or nine o'clock that night.  
 13 Q. And where was she and where were you when  
 14 she called your mother?  
 15 A. I don't remember that.  
 16 Q. But you remember her speaking to her mother?  
 17 A. Yes.  
 18 Q. And do you remember hearing anything that  
 19 she said?  
 20 A. No, sir.  
 21 Q. After she got off the phone, did she tell  
 22 you about anything that was said?  
 23 A. She basically told me that she thinks that I  
 24 had a case in my hands, you know, because of

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1 how everything went. So that's basically  
 2 it.  
 3 Q. And is that something that her mother had  
 4 told her or is Jacqueline telling you what  
 5 she thought?  
 6 A. It was just a suggestion. Like her brother  
 7 gave her this suggestion. It wasn't  
 8 something we were going to be like, yes, we  
 9 are taking them to court. Just to find out  
 10 some information, so that's how she went  
 11 about it. She asked her brother to talk to  
 12 his lawyer to find information, let them  
 13 know what happened, to see if this was  
 14 right, if it was the right thing to do.  
 15 Q. And you said that Rolando called back later  
 16 that day?  
 17 A. I don't know, but I know he called back  
 18 because she said it. I don't know when or  
 19 where, what time. I don't know.  
 20 Q. Did you leave the apartment at any point  
 21 that day?  
 22 A. Yes, I did. I went to go take a walk.  
 23 Q. And when did you do that?  
 24 A. I would say in the afternoon. From

14 (Pages 50 to 53)

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1 afternoon to night. I came back that night.  
 2 Q. You just walked around? Did you go anywhere  
 3 specific?  
 4 A. Yes. My mother lives in Mattapan. I  
 5 think. I don't know. I'm not sure. I just  
 6 know I just left.  
 7 Q. Do you have a memory of going to your  
 8 mother's that day?  
 9 A. Not quite. I don't know if I did or not.  
 10 It's just so many things that happened.  
 11 I've been trying to forget about it, even  
 12 though we're going through this, but it's  
 13 something that's been bothering me for a  
 14 while.  
 15 Q. Okay. At any point, did you have any  
 16 discomfort related to what happened?  
 17 A. Yes. Absolutely. Right after it happened,  
 18 I was trying to walk straight. I was trying  
 19 to hold the pain in. Once everybody left, I  
 20 told her, you know, I'm feeling a lot of  
 21 pain. Like about an hour or so, close to an  
 22 hour, I had to do bowel movement so I went  
 23 and I wiped. There wasn't a whole lot of  
 24 blood, but there was blood in the paper so I

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1 told her and I showed her. She told me to  
 2 go to the hospital, get yourself checked out  
 3 and everything, and I couldn't. I told her  
 4 I can't. That's something that I cannot  
 5 tell a doctor, what just happened. I was  
 6 shy. I was afraid. It was like I couldn't  
 7 do nothing. I couldn't think. I couldn't  
 8 even take care of my son. I felt violated.  
 9 It's crazy.  
 10 Q. You said the officer took the gloves off and  
 11 put them on the floor in the bathroom?  
 12 A. Yes.  
 13 Q. What happened to them?  
 14 A. We picked them up and threw them away. Like  
 15 I said, I thought it was part of the  
 16 procedure so I picked everything up.  
 17 Q. It was part of cleaning up afterwards?  
 18 A. Exactly.  
 19 Q. And you said that there was blood after you  
 20 went to the bathroom. Did that happen  
 21 again?  
 22 A. When I told her, she was speaking to her  
 23 brother. It was like an hour after that. I  
 24 had to use the bathroom. So I went in there

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1 and used it.  
 2 Q. And had that ever happened before? Was  
 3 there ever blood after you did a bowel  
 4 movement before?  
 5 A. No. Never. Never.  
 6 Q. Was that the only time that that happened?  
 7 A. Yes.  
 8 Q. I mean, was that time that you went an hour  
 9 after, was that the only time that you had  
 10 blood or did it happen after that, too?  
 11 A. I was in pain for two days. Every time I  
 12 used it, like it hurt. I couldn't even use  
 13 it. It was crazy.  
 14 Q. How many times?  
 15 A. In two days, I did like three times. I did  
 16 it that one day. The same day, I did it one  
 17 time and I think the next day, two times on  
 18 that day.  
 19 Q. Okay. And then the next day, you didn't  
 20 have blood?  
 21 A. I didn't have blood.  
 22 Q. Okay. And you talked a little about it,  
 23 about sort of how it's bothered you or  
 24 affected you. I would like you to tell me

Page 57

1 about -- for example, you mentioned you  
 2 couldn't even take care of your son. When  
 3 you say that, what do you mean?  
 4 A. I love being around him. Before this  
 5 happened, like I could do anything, but I  
 6 felt so down, like so depressed. Like when  
 7 he wanted something, when he wanted to go  
 8 take a walk, I couldn't. Instead, I just  
 9 didn't feel up to it. Like I lost all  
 10 emotions and everything. I just couldn't do  
 11 anything.  
 12 Q. For how long did this last?  
 13 A. It still is now.  
 14 Q. So you're saying because of this incident,  
 15 you haven't been able to do things with your  
 16 son?  
 17 A. No. I'm not blaming it completely on that,  
 18 but it's just that I'm trying to do what I  
 19 have to do; but emotionally, it's tearing me  
 20 apart. This and all the stress and not  
 21 seeing them because I'm not with Jackie  
 22 now. I'm not with her, so she's in Maine.  
 23 I'm over here. I see them once a month or  
 24 something.

15 (Pages 54 to 57)



Page 58

1 Q. Gabriel lives with Jacqueline?  
 2 A. My two kids. I got two kids with her, my  
 3 daughter and my son with her. And I just  
 4 have a newborn with my new current  
 5 girlfriend now.  
 6 Q. What other factors are affecting your  
 7 relationship with your son? You said a  
 8 little bit about --  
 9 A. When I do see him now, I don't -- it's like  
 10 I grew out of it. It was just at the  
 11 beginning. Like for them, a couple of  
 12 weeks, at least a month, I felt like I  
 13 couldn't do anything. I couldn't go  
 14 outside. Even if I go outside, I couldn't  
 15 run. It's just unexplainable. The feeling  
 16 is totally unexplainable.  
 17 Q. When you say you couldn't run, what do you  
 18 mean?  
 19 A. Because I used to play a lot of basketball,  
 20 but I couldn't run. I'm just saying even if  
 21 I tried to play, I couldn't, because of what  
 22 just happened. That's all I had on my  
 23 mind. That's all I had. It was just  
 24 affecting me for that time period until I

Page 59

1 realized that I needed to move on with  
 2 this. It happened. I've got to deal with  
 3 it.  
 4 Q. How else would you say it's affected you?  
 5 A. Basically, I don't know. I couldn't answer  
 6 you because I'm trying to forget about the  
 7 incident, about the whole feeling of it.  
 8 That's what I'm mainly concerned about, just  
 9 trying to forget how it felt. That's it.  
 10 Q. And when you told me that at the time that  
 11 you thought it was part of the search  
 12 process, I mean, did it still -- strike  
 13 that.  
 14 When did you first go to an  
 15 attorney? Do you remember how long after  
 16 this?  
 17 A. I don't remember. I don't remember.  
 18 Honestly, I don't.  
 19 Q. Okay. Do you remember speaking to anyone in  
 20 the sexual assault unit?  
 21 A. No, I don't remember.  
 22 Q. Do you remember speaking to a Kim Giddy?  
 23 A. Kim Giddy?  
 24 Q. Yes. I'm not saying did you. I'm just

Page 60

1 asking if you did. It's not a trick  
 2 question.  
 3 A. No. I never heard of Kim Giddy, no.  
 4 Q. Were you ever told that prosecuting the  
 5 officer who did this was something that you  
 6 could do? Did anyone ever tell you that?  
 7 A. Besides a lawyer or anybody?  
 8 Q. Don't tell me what you might have said with  
 9 your lawyer. I mean, was that ever  
 10 something that you were told?  
 11 A. Yes.  
 12 Q. And did you do that?  
 13 A. Did I do what?  
 14 Q. Prosecute the officer. Did you take any  
 15 steps to try and press charges against the  
 16 officer for what he did, apart from the  
 17 Internal Affairs?  
 18 A. No.  
 19 Q. Okay. Are you aware that you could charge  
 20 him criminally?  
 21 A. Yes.  
 22 MR. HRONES: Objection.  
 23 THE WITNESS: Objection?  
 24 MR. HRONES: You still answer,

Page 61

1 though. That's just for the record.  
 2 Q. You can still answer the question. So the  
 3 question is, you were aware that you could  
 4 prosecute him criminally in addition to  
 5 civilly?  
 6 A. I didn't know.  
 7 Q. No one ever told you that you could  
 8 prosecute him criminally?  
 9 A. You are kind of confusing me now.  
 10 Q. I don't want to confuse you. I mean, this  
 11 is a civil case and you're aware it's in  
 12 civil court and you're seeking monetary  
 13 damages, correct?  
 14 A. Yes.  
 15 Q. Are you aware or did anyone ever tell you  
 16 that you could prosecute the officer in a  
 17 criminal court?  
 18 A. Yes.  
 19 Q. And did you ever take any steps to do that?  
 20 A. No, sir.  
 21 Q. And why didn't you do that?  
 22 A. I don't know. I have no idea. I don't know  
 23 nothing about that. If I knew before this  
 24 happened, if I knew the law, because

16 (Pages 58 to 61)



Page 62

1 honestly, I'm going to be honest with you,  
 2 it's just I never pay mind but now I regret  
 3 skipping school or acting up or whatever.  
 4 If I knew a little bit about raids and how  
 5 the law is about when doing these searches  
 6 and types of things, then I would have  
 7 decided right off the bat what I'm about to  
 8 do; but since I didn't know anything, I just  
 9 went along with it until I got advice. I  
 10 got advice from Jackie, from her mother.  
 11 They found information and I just decided,  
 12 I'm okay. Let's give this a shot. If this  
 13 is not right, I need to have justice for  
 14 this, because this is something that it put  
 15 me through a lot of pain.  
 16 Q. When you say, "justice for this," what do  
 17 you mean?  
 18 A. I mean, I see all around TV, accidents do  
 19 happen and people want justice for what the  
 20 other person did to them. I found out that  
 21 this is wrong, that that was illegal to do  
 22 so I want justice.  
 23 Q. Do you mean money when you say "justice"?  
 24 A. It's half and half, because I really don't

Page 63

1 care, but yes. On the other hand, yes, if  
 2 that's the only thing that I could get, you  
 3 know, but I just want him to understand what  
 4 he did was wrong.  
 5 Q. Have you seen the officer since this  
 6 happened?  
 7 A. No. I haven't seen none of them.  
 8 Q. Have you ever -- well, we established before  
 9 you haven't been to a doctor since this  
 10 incident?  
 11 A. No, I haven't.  
 12 Q. You have not?  
 13 A. No, I haven't.  
 14 Q. Your complaint alleges the emotional  
 15 distress that you suffered after this, and  
 16 we talked about that. And is it fair to say  
 17 that you -- well, let me ask you, did you  
 18 ever have any problems with feeling sort of  
 19 depressed before this incident?  
 20 A. Yes. I always felt like that. Not like  
 21 totally depressed; but I mean, I've been  
 22 through a rough, rough life. My life has  
 23 been rough. I don't want to leap into it,  
 24 but I've been through a lot; and trying to

Page 64

1 raise a family, then things not working out,  
 2 not finding a job, school and all this, it's  
 3 just basically life is rough for me. It's  
 4 been rough.  
 5 Q. I know you don't want to get too much into  
 6 it. We won't. Just tell me generally,  
 7 before this incident, when you say that  
 8 you've had a rough life and the things that  
 9 sort of affect how you feel --  
 10 A. The big thing that affected my life, it was  
 11 when I was a child. My father -- I could  
 12 literally say I had an abusive father. He  
 13 used to just -- the only one he used to beat  
 14 was my mom. He would come home drunk from  
 15 work and take it out on my mother. So me as  
 16 a kid, I used to see that. That's changed.  
 17 That's been changed now, but it was just as  
 18 a child. It was traumatizing growing up in  
 19 a household like that. It's just  
 20 stressful. I grew up and it's like I have  
 21 nightmares about it. Me and my girl got  
 22 into an argument. It's like anger. It's  
 23 like it comes back out. I was trying to get  
 24 away from that. Once I turned 18, I had to

Page 65

1 see my first son, which is Gabriel. I tried  
 2 to move on. But yet, besides everything  
 3 else, it's work, them, my parents.  
 4 Everything was just stressful, basically.  
 5 Q. Did you tell any of your friends about what  
 6 happened?  
 7 A. No, sir. I can't do that.  
 8 Q. Did you ever tell your mother about what  
 9 happened?  
 10 A. No. I told her that they came by the house  
 11 looking for me, but she knows that that's my  
 12 lawyer.  
 13 Q. You mean relating to this deposition?  
 14 A. Yes, this case.  
 15 Q. But you haven't told her about the specifics  
 16 about what --  
 17 A. No. She doesn't know.  
 18 Q. Aside from Jacqueline, have you ever spoken  
 19 directly to Jacqueline's mother about what  
 20 happened?  
 21 A. Yes. I think one time after it happened. I  
 22 think we went up -- I think so.  
 23 Q. Do you remember the conversation, what it  
 24 was about?

17 (Pages 62 to 65)

Page 66

1 A. She basically like asked me what happened,  
 2 and I told her what happened. We went into  
 3 the bathroom, take the clothes off. No. 1,  
 4 this is what he had to do; and she asked me  
 5 how do I feel. Then she gave me advice to  
 6 go to the doctors, have it checked, but I  
 7 just couldn't.  
 8 Q. Was it shortly after the incident that you  
 9 spoke to Jacqueline's mother?  
 10 A. Not shortly. It was like two or three days  
 11 when we were face to face because she lives  
 12 out in Maine. We live in Boston.  
 13 Q. So the conversation was in person, not on  
 14 the phone?  
 15 A. In person, yes.  
 16 Q. So aside from Jacqueline and Jacqueline's  
 17 mother and your attorney, have you spoken to  
 18 anyone about what happened?  
 19 A. No, sir. This is something I will keep.  
 20 Q. I'm almost done. You say the officer who  
 21 instructed the black officer to take you  
 22 into the bathroom, you had heard him  
 23 speaking Spanish?  
 24 A. Yes. This was like in the beginning, way

Page 67

1 before.  
 2 Q. Do you remember what color hair he had at  
 3 all, that officer had?  
 4 A. Yes. I think it was like -- not dark brown  
 5 but like a little light brown. Yes, like a  
 6 light brown hair.  
 7 Q. And the last time you had any contact with  
 8 Rolando was the day of this incident?  
 9 A. Yes, sir.  
 10 Q. And you had to move, you and Jacqueline and  
 11 Gabriel had to move from this apartment  
 12 because of the fact that drugs were found in  
 13 that apartment?  
 14 A. Yes, and because the landlord had to know.  
 15 I don't know if the officers told him or  
 16 not, but they sent us a letter, a notice  
 17 saying we got two weeks' notice or something  
 18 like that. So we had to leave because of  
 19 the incident, yes.  
 20 Q. You said that you threw away the gloves that  
 21 you found that were left in the bathroom.  
 22 When you were cleaning up after the search,  
 23 did you throw away any other gloves?  
 24 A. Everything.

Page 68

1 Q. Were there other gloves?  
 2 A. Yes. From all of the other cops, when they  
 3 were searching, because the whole house was  
 4 all messed up anyways so why not just take  
 5 off their gloves? They threw them on the  
 6 floor and went about their business.  
 7 MR. COX: Okay. I don't have any  
 8 other questions. If you could just sign  
 9 that down in the corner and put today's  
 10 date.  
 11 THE WITNESS: (Witness complies)  
 12 MR. COX: Thank you very much.  
 13 THE WITNESS: You're welcome.  
 14 Thank you.  
 15 (Diagram marked as Exhibit 1  
 16 for identification)  
 17 (Whereupon, the deposition was  
 18 concluded at 2:35 p.m.)  
 19  
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Page 69

1  
 2 DEPONENT'S ERRATA SHEET  
 3 AND SIGNATURE INSTRUCTIONS  
 4  
 5 The original of the Errata Sheet has  
 6 been delivered to Stephen Hrones, Esq.  
 7 When the Errata Sheet has been  
 8 completed by the deponent and signed, a copy  
 9 thereof should be delivered to each party  
 10 of record and the ORIGINAL delivered to  
 11 Stephen G. Cox, Esq., to whom the original  
 12 deposition was delivered.  
 13  
 14  
 15 INSTRUCTIONS TO DEPONENT  
 16 After reading this volume of your  
 17 deposition, indicate any corrections or  
 18 changes to your testimony and reason  
 19 therefor on the Errata Sheet supplied to you  
 20 and sign it. DO NOT make marks or notations  
 21 on the transcript volume itself.  
 22  
 23 REPLACE THIS PAGE OF THE TRANSCRIPT  
 24 WITH THE COMPLETED AND SIGNED ERRATA  
 SHEET WHEN RECEIVED.

18 (Pages 66 to 69)

Page 70

1 ATTACH TO THE DEPOSITION OF: IVAN SANTIAGO  
2 CASE: SANTIAGO -VS.- FEENEY, ET AL.  
3 ERRATA SHEET

4 INSTRUCTIONS: After reading the transcript  
5 of your deposition, note any changes or  
6 corrections to your testimony and the reason  
7 therefor on this sheet. DO NOT make any  
8 marks or notations on the transcript volume  
9 itself. Sign and date this Errata Sheet  
10 (before a Notary Public, if required).  
11 Refer to Page 69 of the transcript for  
12 Errata Sheet distribution instructions.

13 PAGE LINE

14 CHANGE:

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REASON:

1 I have read the foregoing transcript  
2 of my deposition and except for any  
3 corrections or changes noted above, I hereby  
4 subscribe to the transcript as an accurate  
5 record of the statements made by me.  
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1 COMMONWEALTH OF MASSACHUSETTS)  
2 SUFFOLK, SS. )  
3

4 I, Myriam A. Maracas, Registered  
5 Professional Reporter and Notary Public in  
6 and for the Commonwealth of Massachusetts,  
7 do hereby certify that there came before  
8 me on the 18th day of January 2005, at  
9 1:20 p.m., the person hereinbefore named,  
10 who was by me duly sworn to testify to the  
11 truth and nothing but the truth of his  
12 knowledge touching and concerning the  
13 matters in controversy in this cause; that  
14 he was thereupon examined upon his oath, and  
15 his examination reduced to typewriting under  
16 my direction; and that the deposition is a  
17 true record of the testimony given by the  
18 witness.

19 I further certify that I am neither  
20 attorney or counsel for, nor related to or  
21 employed by, any attorney or counsel  
22 employed by the parties hereto or  
23 financially interested in the action.

24 In witness whereof, I have hereunto  
25 set my hand this 20th day of January, 2005.

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